

# **Exhibit 3**

**Beth Wilkins**

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**From:** Roopal Luhana <Luhana@chaffinluhana.com>  
**Sent:** Friday, January 19, 2024 10:00 AM  
**To:** Ray, Christine Mullen; Sarah London; Rachel Abrams  
**Cc:** Atkins, Robert A; Phillips, Jessica E; Luskey, Randy; Smith, Kyle; Rosen, Jake; Clague, Ronan; Roopal Luhana  
**Subject:** Re: CONFIDENTIAL - MDL 3084 - Uber's Legal Hold and Preservation Information

Counsel, we have had the opportunity to review your letter and accompanying Exhibits and are very concerned that you have failed to comply with Judge Cisneros' Jan. 9, 2024 Order. Uber, *inter alia*, failed to produce a declaration and/or list of non-custodial sources (and did not state it was previously produced) and failed to provide the dates of preserved ESI for Uber employees on litigation hold. You did not seek relief from the Court nor did you confer with Plaintiffs before the deadline to discuss your inability to produce this information. Moreover, the information you have provided is incomplete in numerous other areas. We would like to meet and confer about this immediately. Please let us know if you're available between 2:30-4pm ET Monday to discuss.

We should also confer about custodial, non-custodial and other ESI productions per PTO No. 5 then.

Best,  
Roopal

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**From:** Ray, Christine Mullen <cray@paulweiss.com>  
**Sent:** Wednesday, January 17, 2024 2:15 AM  
**To:** Sarah London <slondon@lchb.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>  
**Cc:** Atkins, Robert A <ratkins@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Rosen, Jake <JaRosen@paulweiss.com>; Clague, Ronan <rclague@paulweiss.com>  
**Subject:** CONFIDENTIAL - MDL 3084 - Uber's Legal Hold and Preservation Information

Counsel:

Please see attached CONFIDENTIAL letter and exhibits.

Best,  
Christine

**Christine Mullen Ray | Associate**  
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*Pronouns: She/Her*

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